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21 **UNITED STATES DISTRICT COURT**
 22 **NORTHERN DISTRICT OF CALIFORNIA**

23
 24
 25 ALL NIPPON AIRWAYS COMPANY,)
 26 LTD.)

27 Plaintiff,)

28 vs.)

29)
 30 UNITED AIR LINES, INC.,)

31)
 32 Defendant.)

33)
 34 UNITED AIR LINES, INC)

35)
 36 Counter-Plaintiff,)

37 vs.)

38)
 39 ALL NIPPON AIRWAYS COMPANY,)
 40 LTD)

41 Counter-Defendant.)

Case No. C07-03422 EDL
 Hon Elizabeth D. Laporte

Defendant United Air Lines'
Amended Motion to Compel Production
of Person Most Knowledgeable
and for Protective Order

Hearing Date: November 13, 2007
Hearing Time: 9:00 a.m.

1 Defendant, United Air Lines, Inc., by and through its attorneys, Jaffe Raitt Heuer &
 2 Weiss, P C., hereby gives notice that the instant Motion to Compel Production of Person Most
 3 Knowledgeable and for Protective Order will come for hearing in the courtroom of the
 4 Honorable Elizabeth D. Laporte on November 13, 2007, at 9:00 a.m /p.m.

5 Defendant United Air Lines, Inc. ("United") hereby moves this Court (1) for entry of an
 6 order under Fed. R. Civ. P. 37 compelling plaintiff All Nippon Airways Co., Ltd., ("ANA") to
 7 produce for deposition under Fed. R. Civ. P. 30(b)(6) the person most knowledgeable of certain
 8 issues pertaining to the parties' Standard Ground Handling Agreement and Annexes thereto
 9 (collectively, the "SGHA") and (2) for entry of a protective order under Fed. R. Civ. P. 26(c)(7)
 10 to prevent the release and dissemination of certain highly confidential, proprietary information
 11 produced in discovery and to limit its exposure to attorneys' eyes only. In accordance with Fed.
 12 R. Civ. P. 26(c) and 37(a)(2)(A), United provides the Declaration of Scott Torpey, attached as
 13 **Exhibit 2** to the supporting brief, to establish that it has in good faith conferred or attempted to
 14 confer with ANA in an effort to secure ANA's cooperation without court action.

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